

August 29, 2019

Mr. Richard W. Corey
Executive Officer
California Air Resources Board
1001 I Street Sacramento, California 9581
via electronic submission to
https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=tfs2019&comm_period=N

RE: Permian Global Supports the Endorsement of the California Tropical Forest Standard

Dear Mr. Corey:

Permian Global respectfully submits this letter in support of the California Air Resources Board (CARB)'s Updated California Tropical Forest Standard ("Standard"). Permian Global is one of the largest tropical forest carbon project developers in the world and is committed to creating the best possible forest carbon offsets in order to help address climate change. In particular, our projects align with the Standard's principles to make a transformational impact on vulnerable communities, habitats and wildlife in some of the poorest regions of the world.

We understand the Standard is a preliminary step to allowing offsets outside of the United States into California's cap-and-trade program, it outlines the importance of providing real incentives for tropical forest communities to conserve tropical forest lands, and reduces climate change risks while providing demonstrable and meaningful local benefits.

In addition, we support the Standard's focus on avoided tropical deforestation and forest degradation; including the need for rigorous and transparent tests of additionality, baseline definition, monitoring, reporting and verification systems; and requiring projects to yield co-benefits to support biodiversity and forest dependent communities. These commitments are already being delivered today and we strongly support the inclusion of such emission reductions as the least expensive route to achieve climate change mitigation at scale. The approach will also lead to the recovery of natural forest ecosystems, with a consequent major contribution to achieving negative emissions and the 1.5-degree global target.

Although we support the endorsement of the Standard, we believe jurisdictional approaches like those promoted in the Standard could be challenging initially to achieve broad success due to the size and complexity of the spatial area being considered. In future deliberations of actual forest carbon projects that will comply with the Standard, we believe emission reductions achieved at a scale smaller than that of the entire jurisdiction have the benefit of being able to utilize higher accuracy data improving their environmental integrity under the required standards. Furthermore, sub-jurisdictional activities allow for clearer monitoring of and accounting for possible leakage, which is instrumental to achieving rigorous and reliable emission reduction assessments and avoiding over-estimates.

Our strong recommendation is for California to endorse the current Tropical Forest Standard and evolve to a system that places the jurisdiction as the regulator and administrator of emission reductions achieved by sub-jurisdictional initiatives (taking the 'nested' approach).

Thank you for your consideration and we are happy to answer any questions you may have.

Best regards,

s/ Stephen Rumsey
Founder and Chairman